

UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

J & J SPORTS PRODUCTIONS, INC., as
Broadcast Licensee of the **May 5, 2007**
DeLaHoya/Mayweather Program,

Plaintiff,

-against-

**MOTION FOR AN EXTENSION OF
TIME TO SERVE
SUMMONS AND COMPLAINT**

Civil Case No. 07-CV-6418-JWD-SIS
HON. ROBERT M. DOW, JR.

JUAN MARTIN REYES, Individually, and as officer,
director, shareholder and/or principal of JM
RESTAURANT, INC. d/b/a BOCADILLO'S a/k/a
MERENDERO BOCADILLOS, and JM
RESTAURANT, INC. d/b/a BOCADILLO'S a/k/a
MERENDERO BOCADILLOS

Defendants.

PLEASE TAKE NOTICE that upon the affirmation of Julie Cohen Lonstein, Esq., dated the 5th day of March 2008, Plaintiff, J & J Sports Productions, Inc., moves this Court at the for an order granting Plaintiff's Motion for an Order extending Plaintiff's time in which to serve the Summons and Complaint in the within action, and for such other and further relief as the Court may deem just and proper under the circumstances.

Dated: March 5, 2008
Ellenville, New York

/s/ Julie Cohen Lonstein
JULIE COHEN LONSTEIN, ESQ.
Attorney for Plaintiff
Bar Roll No. JL8521
LONSTEIN LAW OFFICE, P.C.
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November 13, 2007.

4. Defendant JM RESTAURANT, INC. d/b/a BOCADILLO'S a/k/a MERENDERO BOCADILLOS, was served with the Summons and Complaint on December 17, 2007 and to date, no answer has been filed. Defendant JUAN MARTIN REYES, Individually, and as officer, director, shareholder and/or principal of JM RESTAURANT, INC. d/b/a BOCADILLO'S a/k/a MERENDERO BOCADILLOS (hereinafter referred to as "Defendants"), has not yet been served with a copy of the Summons and Complaint.

5. The 120-day limitations period will expire on March 12, 2008; however, Plaintiff is still attempting to effect service on the Defendant Juan Martin Reyes.

6. Plaintiff respectfully requests a reasonable extension of time in which to serve the Summons and Complaint since personal service upon Defendants has not yet been effected and the local rules of the Court require that personal service be must be effected.

7. Defendants would not suffer any prejudice by the granting of this Motion since Plaintiff seeks only a brief enlargement of time in which to effect service. And no Defendant has appeared in this action.

WHEREFORE, plaintiff respectfully requests that this Honorable Court grant its motion for an extension of time and enter the attached Order of Court.

Dated: March 5, 2008
Ellenville, NY 12428

Sworn to before me this 5th
day of March 2008

/s/ Julie Cohen Lonstein
Julie Cohen Lonstein, Esq.
Attorney for Plaintiff

/s/ April Draganchuk
April Draganchuk
Notary Public State of New York
Registration No. 4945872
Residing in Ulster County
My Commission Expires Jan. 27, 2011